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IN THE

Supreme Court of the United States

OCTOBER TERM, 1962

NO. 316

BROTHERHOOD OF RAILWAY AND STEAMSHIP CLERKS, FREIGHT HANDLERS, EXPRESS AND STATION EMPLOYEES AND BROTHERHOOD OF RAILROAD SIGNALMEN OF AMERICA,

Petitioners

vs.

ANNA MAE ALLEN, ET AL,

Respondents

ON WRIT OF CERTIORARI TO THE SUPREME COURT OF NORTH CAROLINA

BRIEF FOR THE RESPONDENTS

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INDEX

	Page
QUESTION PRESENTED	1
STATEMENT OF THE CASE	2
ARGUMENT	6
I. The Plaintiffs' Cause Of Action Is Not Subject To Dismissal On Any Theory That The Plaintiffs Should Have Notified The Defendant Unions As To What "Particular" Union-Supported Candidates And Causes The Plaintiffs Oppose	6
II. The Judgment Rendered In The Court Below Is Equitable And Appropriate And Is Free Of The Errors Which This Court Found In the *Street* Judgment	13
CONCLUSION	22

CITATIONS

Cases:

Allen, et al vs. Southern Railway Co., et al, 114 F. Supp. 72	11
Anthony vs. American Express Co., 188 N. C. 407, 410; 124 S. E. 753	15
Campbell vs. United States, 365 U. S. 85, 96	15

Page

International Association of Machinists vs. Street, 367 U. S. 740 ..... 2, 7

Milk Wagon Drivers Union vs. Meadowmoor Dairies, Inc., 312 U. S. 287, 294 5

Railway Employees' Department vs. Hanson, 351 U. S. 225 3

Skyland Hosiery Co. vs. American Railway Express Co., 184 N. C. 478, 480; 114 S. E. 823 15

United States vs. CIO, 335 U. S. 106 16

United States vs. New York & N. H. and H. R. Co., 355 U. S. 253, 256, note 5; 2 L. Ed 2d 247, 250; 78 S. Ct. 212 15

Statutes:

1951 Amendment to the Federal Railway Labor Act 2, 4, 11, 21

64 Stat. 1238, 45 USC 152, Eleventh 2

Federal Corrupt Practices Act 14

North Carolina Genl. Stat. 95-82 2

Trade Union Act of 1913, 2 and 3 Geo. V c. 30 17

Appendix 1a

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QUESTION PRESENTED

It having been established in this case that the respondent employees, unless protected by Court order, will be subjected to compulsion such as was adjudged unlawful in *International Association of Machinists vs. Street,* is the remedy which has been granted to them reasonable and appropriate and free of the defects which this Court found in the *Street* judgment?

STATEMENT OF THE CASE

The plaintiffs in this case, now respondents before this Court, are seeking protection against the same compulsion which was held by this Court to be unlawful in the case of *International Association of Machinists vs. Street*, 367 U. S. 740.

The plaintiffs have been notified by their employer and by the defendant labor unions that they will be discharged from their jobs, of long standing, unless they pay money to the defendant unions (R. 8, 13; Orig. Rec. 121-122). It has been established in this case that such money will in part be used by the unions for political purposes unrelated to collective bargaining (R. 22). The plaintiffs have refused to make such payment to the defendant unions and have declared in open Court that they deeply object to money being compulsorily exacted from them for political purposes as to which they have no opportunity of decision or choice (R. 25-50, 71-74).

It is to be observed that if these requirements be imposed upon the plaintiffs, governmental action, that is, the 1951 Amendment to the Federal Railway Labor Act[1], will be the factor which makes such compulsion possible. North Carolina, being a State which has a "right-to-work" statute[2], protecting all employees within its bounds from any such requirements, the case clearly is one in which the compulsion in question could come about only through the active intervention of Federal power.

Except for the Federal Statute, the plaintiffs' employer and the defendant unions are legally barred, by North Carolina law, from collecting any money from the plain-

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[1]64 Stat. 1238, 45 USC 152, Eleventh.

[2]North Carolina Genl. Stat. 95-82.

tiffs "as a condition of employment". Thus it could only be the affirmative action of the Federal Statute, striking down the shield of the North Carolina Statute, which would make possible the placing of the compulsion in question upon these plaintiffs. This was expressly recognized by this Court, prior to the *Street* decision, in the case of *Railway Employees' Department vs. Hanson*, 351 U. S. 225.

In other respects also, the instant case presents and supports the position of the plaintiff employees in an especially strong and favorable light.

This case was tried not upon stipulations of evidence, as was the *Street* case, but by ordinary procedure and the presentation of evidence and testimony through examination and cross-examination before Judge and jury — a jury composed incidentally, as the Trial Court record shows, of varied and representative membership, union and non-union, men and women, white and negro. Thus, the findings of fact in this case were made not by the Court but by the jury, upon issues submitted to them in the usual manner.

The evidence included many pages of exhibits[1] setting forth by dates, names and individual amounts, literally hundreds of thousands of dollars of contributions paid to political candidates whom the higher Union officials selected as the recipients of such largess (R. 108-109; Orig. Rec. 217, 303; 218, 316, Appx. 7a-39a).

There was further voluminous evidence, such as: — copies of thirty-six special editions of a publication (Orig.

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[1]These are all on file with this Court, but in view of their bulk, have, in the main, not been reproduced in this Court's reprint of the record. They are listed in an appendix to this brief, referred to herein as "Appx.", and two of these exhibits are there reproduced.

Rec. 198, 201, 282, 300; Appx. 1a) paid for partly out of compulsory dues money collected from employees (R. 81), espousing and pressing the election campaigns of selected candidates for the House of Representatives and Senate of the United States, and each such "special" edition running to "something less than a million copies" (R. 133) — also, for example, a "Report of the AFL-CIO Executive Council, 1957" (R. 93; Orig. Rec. 206, 283, 303; Appx. 4a) showing expenditures, likewise out of funds derived in part by defendant unions from employees' compulsory dues payments, of $92,343.01 and $139,071.74 for "legislative" purposes (R. 95-96), $232,860.72 and $618,036.12 for "international affairs" (R. 96), and $352,372.18 and $365,722.04 for "political education" (R. 96), and disclosing the use of such funds to procure the enactment or defeat of legislation in such fields as "Disclosure of FBI Files", "Enemy Alien Assets", "Juvenile Delinquency", "Hell's Canyon", "TVA" and "Pay Television" (R. 97, Orig. Rec. 206, 283, 303; Appx. 4a).

Neither the contract (R. 160) between the plaintiffs' employer, the Southern Railway Company, and the defendant Unions, requiring money payments from the plaintiffs, nor the Statute authorizing this contract, that is, the 1951 Amendment to the Federal Railway Labor Act, place any restrictions or limitations upon the amounts of money which may be exacted from the employees. Moreover, the contract runs indefinitely with no provision as to its duration or termination (R. 160-170).

Upon all of the evidence in the case, the jury, upon the several issues submitted to them, specifically found (R. 22) that "the defendant unions" do "use dues and fees" compulsorily collected from employees to procure the enactment of certain "legislation" and the defeat of other "legislation", and "to influence votes in elections to public

office", and "to make contributions to the campaigns of candidates for election to public office". The jury's further finding, anticipating the later determination of this Court to the same effect in the *Street* case, was that such political expenditures were not "necessary or reasonably related to collective bargaining" (R. 22).

The defendant unions still make the assertion (petitioners' brief p. 11), at least with respect to "contributions to the campaign funds of candidates for public office", that "none of it came from dues or fees" collected by them from employees. The difficulty with this is, of course, that after hearing all the evidence and testimony in the case, the jury found the truth to be precisely to the contrary (R. 22).

The unions vainly sought, in the Trial Court, to overturn such finding upon the plea that the evidence did not justify or sustain it. The Trial Court ruled that there was adequate and sufficient evidence upon which the jury could properly have found that the expenditures in question did come from "union dues or fees". The defendant unions presented the same argument to the Supreme Court of North Carolina, and that Court found no merit in it. The plaintiffs do not understand that the defendant unions are now raising any formal challenge on this matter, that is, as to the sufficiency of the evidence to support the jury's verdict. Nor would it be appropriate for them to undertake now to do so in this Court. *Milk Wagon Drivers Union vs. Meadowmoor Dairies, Inc.*, 312 U. S. 287, 294.

In the face of all this, however, the defendant unions now ask this Court to hold that the plaintiffs have no cause of action at all because, at some time which the defendants do not specify, the plaintiffs should have "advised" the defendant unions as to the plaintiffs' objections

to "particular candidates or causes which the Unions were spending dues money to promote" (petitioners' brief p. 19). If the Court will not upon this ground dismiss the plaintiffs' case altogether, then, the defendant unions urge, the remedy which has been granted to the plaintiffs should be held by this Court to be improper (petitioners' brief pp. 21-22).

ARGUMENT

I. The Plaintiffs' Cause Of Action Is Not Subject To Dismissal On Any Theory That The Plaintiffs Should Have Notified The Defendant Unions As To Wh "Particular" Union-Supported Candidates And Causes The Plaintiffs Oppose

To the defendant unions' contention that the plaintiffs' case must be dismissed, because the plaintiffs have not notified the unions of the union-supported political candidates or causes the plaintiffs' oppose, the first answer is that by bringing this suit and by positive and repeated testimony in open court during the course of this action, the plaintiffs made it abundantly clear to the defendant unions, and to all concerned, that they, the plaintiffs, objected to the unions' taking money from them and spending it on political causes and candidates selected by union officials without the plaintiffs having any opportunity of choice or decision in such selections.

It was thus that the plaintiffs in the *Street* case made known to the unions their objection to the unions' taking and using their money for political purposes. Yet this Court held that those plaintiffs had good standing in Court

and a valid cause of action. As the majority opinion stated:

> "The appellees who have participated in this action have *in the course of it* made known to their respective unions their objection to the use of their money for the support *of political causes*". (emphasis supplied)
>
> *International Association of Machinists vs. Street*, 367 U. S. 740, 771.

So, exactly, have the plaintiffs in the present case done.

It is clear that the purpose of the repeated language in the *Street* opinions, with respect to objection and protest, is to emphasize the necessity of an employee's taking an affirmative position of dissent and protest, if he would have the protection of Court. For this reason, the Court dismissed all requests for relief for employees in general or "as a class". Surely, however, those who, like the plaintiffs, bring suit against their employer and the unions, and take their stand in open Court, are actively expressing objection and dissent and protest.

As to the unions' present plea that the plaintiffs' protests were not specific enough, it is further to be noted that they never made any demand in the Courts below for any sort of bill of particulars.

Moreover, it seems pertinent to ask how the plaintiffs could have "advised" the unions as to which "particular" union-supported political causes and candidates the plaintiffs opposed, since the evidence in the case is that the unions never informed even their local leaders as to what candidates or causes the unions would support or oppose. For example, the President of the Charlotte Local Lodge

of the defendant, Brotherhood of Railway Clerks, testified (Orig. Rec. 107):

> "None of the officials above the Local Lodge ever informed the Local Lodge membership in any way as to what would be the policy of the national Union on any matters of legislation or political candidates".

Similarly, the Secretary-Treasurer of the same Local Lodge testified (Orig. Rec. 112, 117):

> "The North Carolina Legislative Committee of the Railway Clerks does not make any report to the Local Lodge or to the membership of the Lodge as to what they are doing or what they have done, so far as I know, or what they aim to do".

> "To the best of my knowledge I have never heard of the officials of the Grand Lodge or the System Board or the Legislative Committee in any way making it known to the Local Lodge or the Local membership what legislation or what candidates they, that is the officials, were going to favor or oppose".

Still further, the Unions' argument that the plaintiffs' case should be dismissed for failure on the part of the plaintiffs to notify the Unions as to which Union-supported political activities the plaintiffs oppose — is thoroughly amazing in view of the fact that the Unions have vigorously contended that they do not use employee dues and fees "in *any* political activity". Thus, the Union defendants declared in their brief (p. 7) before the Supreme Court of North Carolina that:

> "There is no evidence that either the Brotherhood of Railway Clerks or the Brotherhood of Railroad Signalmen engage in any political activity".

In the same brief (pp. 67, 68) they asserted that:

> "There is no credible evidence that the defendant unions used dues and fees to influence votes in elections to public office or for contributions to campaign funds".

> "The President of the Brotherhood of Railway Clerks, Mr. George M. Harrison, testified that his organization had not used funds to advance the candidacy or campaign of any person running for political office".

Since the unions contend that they do not use *any* employee dues or fees to support *any* political candidates or causes, how can they rationally argue that the plaintiffs should protest against the unions' use of their money for "particular" candidates or causes?

It is also to be observed that as they inveigh against the plaintiffs for failure to make specific protests, the unions themselves offer no specifics as to how or when or how often the plaintiffs should so "advise" them. Should the employee at each monthly dues-paying time deliver to his union a list setting forth all the candidates and causes throughout the nation supported by the union but opposed by the employee, and vice versa? And should such listing be revised by the employee each time he pays dues, as the union changes or adds to the causes and candidates it supports and opposes? And how is this to be done since the union does not inform its members, nor even its local leaders, as to who and what are its political candidates and causes — and indeed solemnly avows that it has none?

Still further, what would indeed be the purpose or the consequence of the employees' furnishing such particulars to the union? Would the union thereupon cease supporting with employees' dues, or reduce such support of, candidates

or causes whom it declares it does not support with employees' dues anyhow?

But it seems unnecessary to pursue the defendants into the absurdities of their position on this subject. It should be sufficient to note that the plaintiffs have fought this case for many years in various Courts[1], and "in the course of it" have certainly "made known" to the union defendants their clear and unmistakable objection and protest against being compelled to pay money for political purposes as to which they have no opportunity of decision or choice.

Going beyond the plaintiffs in the *Street* case and taking the witness stand to state their position, the plaintiffs in the present case testified, for example:

Meriam P. Thompson (R. 26-27): — "I am opposed to being required to pay money each month to a labor union, which the union may use for purposes upon which the union decides".

. . .

"I think every American has a right to choose for himself what he wants to do with his money he earns for himself with his own hands, without having to go through a union to do it".

. . .

"The laws which the union might support or which the union might oppose to which I object would be the right-to-work law for one thing, because I am in favor of the right-to-work law and I am sure the unions are not. Another law would be part of the Railway Labor

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[1]At one stage the union defendants took this case into the Federal Courts, from whence it was remanded by a three Judge Court to the State Courts. *Allen, et al vs. Southern Railway Co., et al,* 114 F. Supp. 72.

Act, specifically what we are here in Court fighting today. This is the union shop agreement provisions of the Railway Labor Act. Those two laws specifically are the ones I have in mnd".

Craven Smith (R. 28-29): — "Q. If the evidence in this case, Mr. Smith, should show that the Railroad Unions require employees of the Southern Railway to pay money to them in order for those employees to keep their jobs, and that the Railway Unions then take that money and use part of it to support certain legislation and to oppose other legislation, to support and influence campaigns for certain political candidates and elect certain candidates and to defeat other political candidates, what is your position with respect to such use of dues money taken from you againt your will?"

"A. I am definitely opposed to such activity. I am opposed to such use of my money because it strikes at the foundation of our American life. I think every American should be free to join what he pleases and use the money that he earns the way that he wants to".

. . .

"I know that North Carolina has the right-to-work law. I am in favor of that law. I am not in favor of having any money taken from me against my will and used to repeal that law. I know that the 1951 Amendment of the Federal Railroad Labor Act made the union shop agreement possible. I am not in favor of that law but I am against it. I am not agreeable to having money taken from me against my will and used to maintain that law in effect".

George E. Atwell (R. 32): — ". . . I certainly am opposed to them (the unions) advocating or endorsing candidates . . . I would say that when the Unions endorse

candidates who are in favor of continuing that portion of the Railway Labor Act which permits the union shop, I am opposed to that".

Harold B. Hackney (R. 72): — "Q. Now, Mr. Hackney, if the evidence in this case should establish, or tend to establish, that the moneys which would be required to be paid by an employee of the Southern Railway in a position such as yours under the Union shop agreement, moneys required to be paid to the union under that agreement, would be used in part to support legislation or candidates, certain legislation and certain candidates, and to oppose other legislation and other candidates, what is your position with respect to such use of your money?"

"A. I would be absolutely against that, because I think I have sense enough to choose the candidate I would like to support myself, and then on the other hand, I think a man has a right to choose what legislation he believes in and wants to support and any candidate he believes in and wants to support".

Rebecca Scholl (R. 340): — "I would like to feel that I could support the candidates whom I wanted to; if I gave any money to the campaign, I would like to have it on the candidate whom I support and not from someone else selecting".

Elizabeth Brown (R. 48): —"If the evidence should establish or tend to establish a part of the money collected by the union is used to oppose and seek to repeal the right-to-work laws, I am opposed to such use of my money, because I am for the right-to-work laws. If the evidence should establish or tend to establish that part of the money collected by unions would be used to maintain the Federal law which makes possible Union shop

agreements and that part of the money would be used to maintain that law in effect, I would be opposed to it."

R. P. Powell (R. 37): — "I would not be agreeable to having my money taken from me in any amount and used by the union to accomplish the wiping out of the right-to-work law".

Mary B. Crosby (R. 33): — "Q. If the evidence should show that the money which you might be compelled to pay to the union would be used in part to influence the passage of laws, or to defeat the passage of legislation, or to influence the election of certain candidates and defeat the election of other candidates, what is your position with respect to such uses of your money?"

"A. I am opposed to it. I am opposed to use of my money to influence the passage of laws or effect the election of candidates, because I think that as individuals we should have the right to make our own decisions about such matters".

Yet in the face of all such declaration of dissent and protest, the defendant unions assert in their Petition to this Court (p. 14) that each of the plaintiffs "is to be regarded as a voluntary or acquiescing dues payer"!

II. The Judgment Rendered In The Court Below Is Equitable And Appropriate And Is Free Of The Errors Which This Court Found In The *Street* Judgment

It having been adjudicated, in harmony with this Court's ruling in *Street*, that unless protected by Court order, the plaintiffs will be subjected to an unlawful compulsion, that is, the taking and use of their money for

political purposes against their will, the question is — what Court action is appropriate to protect them?

It is submitted that a fair and reasonable answer is to be found simply in following the basic line of distinction which this Court has laid down. The Court has said that all employees covered by the union shop contract must contribute to the "costs 'in the realm of collective bargaining' ", but that objecting employees cannot be made to contribute to political purposes.

The common sense solution of the matter is, therefore, to use the line which this Court has drawn to separate the dissenting employees' dues money, so that the portion which will be used for "defraying the costs of collective bargaining", and which the plaintiffs can lawfully be compelled to contribute, will be on one side of the line — and the portion which will be used for political purposes, and which the plaintiffs cannot lawfully be compelled to contribute, will be on the other side of the line. Only the latter portion would the unions be barred from collecting.

The unions would thus remain completely free to collect whatever amounts the union shop agreement might authorize from all voluntary members and whatever amounts might be "necessary or reasonably related" to collective bargaining from all members, voluntary and dissenting alike. Likewise, the unions would then be completely free to spend any and all of the moneys received by them from all sources for any and all purposes whatsoever[1].

The separating of the two portions, in the case of dissenting employees, should, of course, in the first instance be done by the defendant unions. For they are the only

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[1]Unless, of course, restricted by some law, such as the Federal Corrupt Practices Act, not pertinent here.

persons or parties involved who know, or have the facts and information enabling them to know, what portion of the dues money is used to defray the "costs of collective bargaining" and what portion is used for political purposes. They, and they alone, know what *they* do with the money.

As this court, in an opinion by Mr. Justice Brennan, has well expressed it:

> ". . . (T)he ordinary rule, based on considerations of fairness, does not place the burden upon a litigant of establishing facts peculiarly within the knowledge of his adversary. *United States vs. New York, N. H. and H. R. Co.*, 355 U. S. 253, 256, note 5; 2 L Ed 2d 247, 250; 78 S. Ct. 212".
>
> *Campbell vs. United States*, 365, U. S. 85, 96.

Such, also, is the view of the North Carolina Courts:

> "It is a rule of practically universal acceptance that where a particular fact, necessary to be proved, rests peculiarly within the knowledge of a party, upon him the law casts the burden of proving such fact".
>
> . . .
>
> "The rule as to the burden of proof is important and indispensable in the administration of justice. It constitutes a substantial right of the party upon whose adversary the burden rests; and therefore, it should be carefully guarded and rigidly enforced by the courts".
>
> *Skyland Hosiery Co. vs. American Railway Express Co.*, 184 N. C. 478, 480; 114 S. E. 823
>
> *Anthony vs. American Express Co.*, 188 N. C. 407, 410; 124 S. E. 753

In *United States vs. CIO*, 335 U. S. 106, a case involving union publications for political purposes, the separating of the dissenting employee's union dues into two portions, one of which he would be required to pay and the other of which he would be relieved from paying, was suggested:

> "If . . . 'minority or dissenter protection' were intended, it would be sufficient for securing this to permit the dissenting members to carry the burden of making known their position *and to relieve them of any duty to pay dues or portions of them to be applied to the forbidden uses,* without jeopardy to their rights as members. This would be clearly sufficient, it would seem, to protect dissenting members against use of funds contributed by them for purposes they disapprove, but would not deprive the union of the right to use the funds of concurring members . . ." (emphasis supplied)
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> *United States vs. CIO*, 335 U. S. 106, 149 (Concurring opinion of Rutledge, J., with whom Mr. Justice Black, Mr. Justice Douglas and Mr. Justice Murphy joined)

It is also significant to note that in the brief filed by the United States in the *Street* case, it was agreed (p. 46) that:

> ". . . (I)t may be appropriate to reduce the obligations of the dissenting members in proportion to the percentage of the union's total expenditures which are used for the forbidden purposes. Such questions need not be resolved at this time, however, for no relief of this kind was requested by the appellees or granted by the Courts below".

In the present case, however, this *is* the relief which was requested by the plaintiffs, and this *is* the relief which was granted by the Courts below[1].

Several years before this Court came to this problem in the *Street* case, the Trial Court in the present case foresaw the difficulties which might arise on this matter and undertook to frame a judgment which would deal fairly with the interests of all concerned. The plaintiffs believe that this judgment will now recommend itself to this Court as reasonable and proper upon the facts of this case — and as one which avoids the features that this Court found objectionable in the *Street* case.

It will be remembered that in the *Street* case Mr. Justice Brennan, speaking for himself, Chief Justice Warren, Mr. Justice Clark and Mr. Justice Stewart, considered, as did Mr. Justice Douglas and Mr. Justice Black, that the judgment which had been rendered by the lower Court in the *Street* case was too broad, in that it ran "not only in favor of six protesting employees but also in favor of the 'class they represent' ". All six of these Justices agreed that relief should be confined to the individual plaintiffs. In the present case, by contrast, all element of "class action" was rigorously eliminated by the Trial Court. The judgment now before the Court does not purport to operate in behalf of any one except the individuals who are actual plaintiffs in the case.

The Court will also recall that in the *Street* case, the lower Courts had "perpetually enjoined" the unions and

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[1]In Great Britain, such relief is apparently provided and required by Statute. Trade Union Act of 1913, 2 and 3 Geo. V, c. 30. Under this legislation the dissenting union member can "contract out" from any duty to make any payments toward the cost of the union's political activities.

the Railway Companies "from enforcing the said union shop agreements", and had provided only that the defendants might petition for dissolution of such injunction upon a showing that they had ceased "engaging in the improper and unlawful activities" which had been found.

Mr. Justice Brennan, for himself, Chief Justice Warren, Mr. Justice Clark and Mr. Justice Stewart, expressed the view that:

"*Restraining the collection of all funds* from the appellees sweeps too broadly . . ."

"Even though the lower Court decree is subject to modification upon proof by the appellants of cessation of improper expenditures, in the interim the prohibition is *absolute against the collection of all funds*. . . . The *comp'ete shutoff* of this source of income defeats the congressional plan to have all employees benefited share costs 'in the realm of collective bargaining' . . ."

"We also think that a *blanket injunction* against *all expenditures* of funds for the disputed purposes, even one conditioned on cessation of improper expenditures, would not be a proper exercise of equitable discretion". (emphasis supplied)

The four Justices joining in the main opinion therefore voted to remand the case to the Georgia Courts for the framing of a judgment "not inconsistent" with their opinion.

Mr. Justice Douglas, without whom the four Justices joining in the main opinion would not have constituted a majority, was reluctant to take this course, but said ". . . there is the practical problem of mustering five Jus-

tices for a judgment in this case. So I have concluded *dubitante* to agree to the one suggested by Mr. Justice Brennan . . ."

It is thus apparent that the Court was casting about for a remedy which would not be illusory to the protesting employees nor too restrictive upon the unions — a judgment which would effectively protect the dissenting employees' liberties but also leave the unions free to function as bargaining agents for all employees.

It is submitted that the judgment rendered in the present case accomplishes just such an accommodation of these conflicting interests. For here, there is no injunction "restraining the collection of all funds" from the plaintiff employees. There is no prohibition "absolute against the collection of all funds" from the plaintiffs. There is no "complete shutoff of union income from the plaintiffs". And there is no "blanket injunction against all expenditures of funds for the disputed purposes" — nor, indeed, any injunction against any expenditures of any sort by the unions.

The defendant unions declare (petitioners' brief pp. 21-22) that the judgment rendered in this case is "an injunction against the enforcement of the union shop agreement" and that by its terms the unions are prohibited from "collecting anything from the respondents under the union-shop agreement". This is not true. The judgment specifically provides that upon the unions' designating and separating, to one side of the very line of demarcation which this Court has since drawn in the *Street* case, that portion of the dues money which will be used to defray "the costs of collective bargaining"—"this Order shall have no application or force or effect with respect to such portion of such periodic dues, initiation fees or assessments or the

imposition and collection thereof under the terms of the contract referred to in the pleadings".

This Court has, of course, no solicitude or concern for the union-shop agreement, insofar as it operates, as this Court itself holds, unlawfully — that is, insofar as it accomplishes the taking and using of employees' money for political purposes against their will. The concern which this Court expresses is that in thwarting this unlawful operation of the union-shop agreement, there shall be no interference with the full operation of the agreement in all its other lawful areas and functions.

This is exactly the adaptation which the present judgment makes. It touches and inhibits the union shop agreement only in its process of accomplishing the unlawful. It leaves the union shop agreement untouched and completely free to operate in all other respects[1].

This also is to be remembered — that since, as this Court holds, the Federal Statute does not authorize or protect the exaction of money from employees for political purposes against their will, such exaction, in the case of these North Carolina plaintiffs, automatically becomes subject

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[1]The judgment also restrains the defendant unions from compelling the plaintiffs "to join" or "conform to the rules or disciplines" of the unions. It does not appear, however, that the unions make any point of this, and indeed it seems to have been conceded on all sides, both in this case and in the *Street* case, that neither the Railway Labor Act as amended, nor the union shop agreement executed thereunder, purport to authorize any compulsion upon employees save only with respect to the payment of "periodic dues, initiation fees and assessments". The defendant unions in their brief (pp. 5-7) before the Supreme Court of North Carolina, declared this to be so. Thus there is no dispute as to the enjoining of non-monetary compulsions — all such compulsions being prohibited by the North Carolina Statute and not even claimed to be authorized by the Federal Statute.

to the express interdiction of North Carolina law. In other words, as this Court declares the exaction to be not sanctioned or protected by the 1951 Amendment to the Railway Labor Act, it immediately falls beneath the thrust of the North Carolina "right-to-work" statute. This Federally-unprotected exaction — and this only — is what the North Carolina Court has enjoined.

The argument of the defendant unions seems to assume that, although ruling the forced exaction of employees' money for political purposes to be unlawful, this Court is somehow still solicitous in behalf of the unlawful process. In this, the defendants seem to suggest that the *Street* decision is basically self-contradictory, moving in opposite directions at the same time — a sort of juridical Janus.

The defendants apparently would have the Court say to the plaintiffs: — "We hold this compulsory exaction of money from you for political purposes to be unlawful. *Nevertheless, you must submit to it.* Perhaps, some day, somehow, through arduous effort and protracted litigation and the expenditure of a thousand times the amount involved, you may restrain the expenditure of some part of what you must now fully pay, or possibly obtain restitution for the unlawful compulsion which you must now accept".

And how often would the dissenting employee have to bring suit to achieve these remote and pitiful results? Each action would adjudicate nothing save the disposition of the money involved in that case — leaving the employee completely unprotected against successive and unending repetitions of the same unlawful compulsion, so that as long as he remained an employee, he could maintain the right which the Court has declared to be his, only by ceaseless, renewed and perpetual litigation.

Would all this be consistent with any principle of the avoidance of multiplicity of suits? Would it comport with

equity — or fairness — or common sense? Above all, would it not be a solemn and cynical mockery of the fundamental liberty and freedom of choice for which these plaintiffs are struggling?

These plaintiffs pray that the Court will not, at the defendants' behest, render a decree which would be to the plaintiffs but a giving with one hand and a taking away with the other — transforming the right which this Court has declared to be theirs into an illusion — a mirage — a faith "pledged to the ear and broken to the heart"!

As this Court has itself said, the issues underlying this field of controversy are "of the utmost gravity". Vital principles are at stake — not only vital to individual freedom but equally crucial to the integrity of Government. For if arrangements are now established under which American citizens, in order to work, will be compelled to pay money to collective representatives, which these representatives then use to elect whom they will to public office and to enact what they wish into law — then both individual liberty and free government are indeed on the road to extinction in our land.

And it, of course, avails naught that this is declared to be unlawful — *if for lack of practical and meaningful remedy, the oppression is still accomplished.*

CONCLUSION

The plaintiffs earnestly urge upon the Court that the remedy which has been granted them is necessary and reasonable and appropriate, and that the judgment rendered below should be affirmed.

Respectfully submitted,

WHITEFORD S. BLAKENEY

Attorney for the Plaintiff-Respondents

APPENDIX

Plaintiffs' Exhibits Received In Evidence — As Listed And Described In Original Record

1. Agreement dated February 27, 1953 (Orig. Rec. 282 and 283-296; also printed in U. S. Supreme Court reprint of record 160-170) and copy of P. L. 914, 81st Congress (1951 Amendment to Federal Railway Labor Act, 64 Stat. 1238, 45 USC 152 Eleventh — Orig. Rec. 297-299).

2. Constitution of Grand Lodge, Brotherhood of Clerks (Orig. Rec. 282).

This exhibit — the Constitution of the Grand Lodge — Statutes for the Government of Lodges and Protective Laws of the Brotherhood of Railway and Steamship Clerks, Freight Handlers, Express and Station Employees — consisted of a printed pamphlet 167 pages long. Since it is not practicable to reproduce it in the record proper, the appellants are filing nine copies of the same with the Clerk of the Supreme Court in accordance with Rule 19 (Orig. Rec. 299).

3. 3a-3aj, copies of pages from the newspaper "Labor" (Orig. Rec. 283).

Exhibits 3a-3aj consisted of photostatic copies of pages from various editions of a newspaper known as "Labor". (There appear to be no exhibits 3ah and 3ai — possibly due to an error in numbering on the part of the reporter). Since it is not practicable to reproduce these exhibits in the printed record, the appellants are filing with the Clerk of the Supreme Court nine copies of each of them, in accordance with Rule 19 (Orig. Rec. 300).

4. Clipping from "Labor", for October 27, 1956 (Orig. Rec. 283).

5. Clipping from "Labor", for October 6, 1956 (Orig. Rec. 283).

6. Clipping from "Labor", for October 20, 1956 (Orig. Rec. 283).

Plantiffs' exhibits Nos. 4, 5 and 6 consisted of substantial clippings from various editions of the above mentioned newspaper known as "Labor". Since it is not practicable to reproduce these exhibits in the printed record, the appellants are filing with the Clerk of the Supreme Court nine copies of each of them, in accordance with Rule 19 (Orig. Rec. 300).

7. "Brotherhood of Railway Clerks Bulletin", for October, 1956 (Orig. Rec. 283).

This exhibit consisted of an issue of a magazine known as "Brotherhood of Railway Clerks Bulletin" for October 1956, which is approximately 30 pages long and includes various photographs, etc. Since it is not practicable to reproduce this exhibit in the printed record, the appellants are filing with the Clerk of the Supreme Court nine copies of this exhibit, in accordance with Rule 19 (Orig. Rec. 300).

8. "The Railway Clerk", for May 1, 1956 (Orig. Rec. 283).

9. "The Railway Clerk", for May 15, 1956 (Orig. Rec. 283).

10. "The Railway Clerk", for October 15, 1956 (Orig. Rec. 283).

'Plaintiffs' exhibits Nos. 8, 9 and 10 consisted of issues of a magazine known as "The Railway Clerk" dated May 1, 1956, May 15, 1956 and October 15, 1956. These magazines each contain a substantial number of pages together with numerous photographs, charts and diagrams, etc. Since it is not practicable to reproduce these exhibits in the printed record, the appellants are filing with the Clerk of the Supreme Court nine copies of this exhibit, in accordance with Rule 19 (Orig. Rec. 300-301).

11. Letter, dated August 21, 1957, from North Carolina State Legislative Committee, Brotherhood of Clerks, to Secretary of State of N. C. (Orig. Rec. 283 and 301-302; also printed in U. S. Supreme Court reprint of record 170-171).

12. "Legislative Facts, 1957" (Orig. Rec. 283).

This exhibit consisted of a printed pamphlet entitled "Legislative Facts 1957", and subtitled "A Handbook of Legislative Information Published as a Supplement to the June 1951 Bulletin, Brotherhood of Railway and Steamship Clerks, Freight Handlers, Express and Station Employees". It contains approximately 36 pages of printed matter, charts and diagrams, and it is not practicable to reproduce it in the printed record. No additional copies of the same are available to the appellants, and by reason of the nature of the exhibit, it is not practicable to have a sufficient number of copies of the same reproduced, by any available means. Therefore, the appellants are filing with the Clerk of the Supreme Court the original of Plaintiffs' Exhibit No. 12, together with a motion directed to

the Supreme Court requesting that this exhibit be accepted in lieu of formal compliance with the regular rules of the Court for exhibits, under the circumstances (Orig. Rec. 302-303).

13. "Report of the AFL-CIO Executive Council, 1957" (Orig. Rec. 283)

This exhibit consisted of a printed book approximately 408 pages long, exclusive of the cover, entitled "Report of the AFL-CIO Executive Council, 1957, Second Convention". No additional copies of this exhibit are available to the appellants and, by reason of the size and nature of this exhibit, it is not practicable for the appellants to have the same reproduced by any available means. Therefore, the appellants are filing the original Plaintiffs' Exhibit No. 13 with the Clerk of the Supreme Court together with a motion addressed to the Court requesting that the appellants be relieved of formal compliance with the rules of the Court regarding exhibits, under the circumstances (Orig. Rec. 303).

14. Letter on R. L. P. L. letterhead, 401 Third Street, N. W., January 1, 1957 — C 4127 (Orig. Rec. 303).

(This exhibit reprinted in present Appendix to respondents' brief).

15. Excerpts from Report of Committee on Political Education to Clerk of U. S. House of Representatives (Orig. Rec. 316).

(This exhibit reprinted in present Appendix to respondents' brief).

16. Letter from Brotherhood of Railway Clerks, Lodge No. 473, to L. J. Byrum, dated April 1, 1957 (Orig. Rec. 332-335).

17. Excerpts from proceedings of the 20th Regular and Sixth Quadrennial Convention of the Brotherhood of Railway and Steamship Clerks, Freight Handlers, Express and Station Employees (Orig. Rec. 335-337; also printed in U. S. Supreme Court reprint of record 172-173).

18. The signalman's Journal, for August, 1956 (Orig. Rec. 337).

This exhibit consisted of an issue of a magazine called The Signalman's Journal for August, 1956. The original exhibit consisted of more than 30 pages, including numerous photographs, diagrams, etc. No additional copies of this magazine are available to the appellants and it is not practicable to reproduce the whole magazine by any available means. Therefore, the appellants have reproduced and are filing with the Clerk of the Supreme Court nine copies of the cover page, page 225, which is the Table of Contents, and pages 238 and 239, the latter two pages being the two pages which were read to the jury by the plaintiffs' counsel and the Table of Contents being the page which was read to the jury by the Union defendants' counsel (Orig. Rec. 337).

19. Constitution of the Brotherhood of Railway Signalmen of America (Orig. Rec. 337).

This exhibit consisted of a mimeographed copy of the Constitution of the Brotherhood of Railway Signalmen of America (as revised at the 30th Regular Convention, 1950). It is approximately 160 pages long and so it is not

practicable for it to be included in the printed record. Therefore, the appellants are filing with the Clerk of the Supreme Court nine copies of the same, in accordance with Rule 19 (Orig. Rec. 337).

20. "Special and Final Notice — Signal Employees Subject to the Provisions of the Union Shop Agreement of 1953" (Orig. Rec. 337-341; also printed in U. S. Supreme Court reprint of record 173-176).

21. "Application for Reinstatement in the Brotherhood of Railroad Signalmen of America" (Orig. Rec. 341-345).

PLAINTIFFS' EXHIBIT NO. 14 (Orig. Rec. 303-309)

January 1, 1957
C 4127

Letter on R. L. P. L. letterhead, 401 Third St., N. W.

A. E. Lyon, Chrm.

G. E. Leighty, V. Chr.

C. T. Anderson, S. Treas.

addressed to Hon. Ralph R. Roberts, Clerk, U. S. H. of R.:

"As required in the provisions of the Federal Corrupt Practices Act, as amended, I herewith submit the information containing the activities of Railway Labor's Political League. To the best of my knowledge, this is a true and accurate report of these receipts and expenditures.

(1)	C. T. Anderson, 401 3rd St NW Wash DC 6-15-56	100.00
	Max Lowenthal, New Milford, Conn 7-5-56	2,500.00
	A. E. Lyon, 401 3rd St NW Wash DC 8-15-56	100.00
	Edward Keating, 4625 Charleston Terrace, Wash DC, 9-26-56	100.00
	Horace W. Harper, 844 Rush St Chicago, Ill, 10-2-56	100.00
	Jesse Clark, 503 Wellington Ave Chicago, Ill, 10-8-56	100.00
	C. L. Bromley, 503 Wellington Ave Chicago, Ill, 10-8-56	100.00
	Edward J. Hickey, Tower Bldg. Wash DC, 10-9-56	500.00
	Harry See, 401 3rd St NW Wash DC, 10-2-56	100.00

	Lester P. Shoene, 1625 K St NW Wash DC, 10-29-56		1,000.00
	E. H. Benson, 401 3rd St NW Wash DC, 10-29-56		100.00
	A. E. Lyon, 401 3rd St NW Wash DC, 10-29-56		100.00
(2)	$97,626.77		
(3)	Total sum of contributions received in 1956		$102,526.77
(4)	1-31-56	Harley O. Staggers, Keyser, W Va	1,000.00
	3-17-56	Robert Michel, Perkin, Ill	300.00
	3-27-56	Staggers for Congress, Keyser, W Va	1,000.00
	4- 9-56	Cecil Callison, Treas. Magnuson Campaign Comm	2,000.00
	4-10-56	H. E. Wolf, Treas. Smathers Campaign Comm	350.00
	4-17-56	Democratic National Comm Wash DC	5,000.00
	4-17-56	Woodrow Wilson Dinner Comm Wash DC	2,000.00
	4-25-56	James C. Murray Campaign Comm, Chicago Ill	500.00
	4-25-56	Barrett O'Hara, Chicago Ill	500.00
	4-25-56	Citizens Comm for Peter F. Mack, Carlinville, Ill	500.00
	5-14-56	Kentucky Campaign, K. Birkhead, Wash DC	1,000.00
	5-25-56	COPE, Wash DC	99.00
	6-11-56	Calif Railway Labor Citizens League	500.00
	6-12-56	W. J. Burton, Jr. Spencer NC	325.00
	7- 2-56	Gene Wyatt, Pulaski, Tenn	500.00
	7- 2-56	Lenoir Sullivan, St Louis, Mo	500.00

7- 2-56	E. L. Skipper, Box 5 Hamlet, NC	83.45
7- 2-56	John B. Bennett, Ontonagon Mich	500.00
7- 2-56	Hayworth Campaign for Congress, E Lansing Mich	500.00
7- 2-56	Charles Hurley, Hancock City, Muskie Campaign Mgr	1,000.00
7- 5-56	Torbert Macdonald for Congress, Malden, Mass	500.00
7- 5-56	John V. Beamer, Wabash, Ind	500.00
7- 5-56	Frank M. Clark, Bessemer, Pa	500.00
7-10-56	Union County Dem Comm Westfield, N J	500.00
7-10-56	John B. Bennett, Ontonagon, Mich	500.00
7-10-56	Reelect Sen Morse Comm Wash DC	1,000.00
7-13-56	Leslie Biffle, Treas Dem Senatorial Camp Comm	2,000.00
7-16-56	Dem Senatorial Camp Comm Wash DC	2,000.00
7-24-56	Johnson for Congress, Black River Falls, Wis	500.00
7-30-56	Gene Wyatt, Pulaski, Tenn	500.00
8-21-56	Don Magnuson Finance Comm Seattle, Wash	500.00
8-21-56	Burnside for Congress Comm Huntington, W Va	500.00
8-24-56	Wayne Morse Camp Comm Wash DC	5,000.00
9- 5-56	Stengel for Senator Comm Chicago, Ill	5,000.00
9- 5-56	Foley for Congress Comm Kensington, Md	500.00
9-13-56	Alonzo Young, for Maine Campg	500.00
9-13-56	Macdonald for Congress Comm Malden, Mass	500.00
9-13-56	Frank M. Karsten, St Louis, Mo	500.00

9-18-56	Cleveland M. Bailey, Clarksburg, W Va	500.00
9-21-56	Dodd for Senator Comm Hartford, Conn	2,000.00
9-21-56	Gracie Pfost Campaign Comm Nanipa, Idaho	500.00
9-21-56	Henry S. Renss, Milwaukee Wis	500.00
9-21-56	Hull for Congress Club, Platte City, Mo	500.00
9-21-56	Winfield K. Denton, Evansville, Ind	500.00
9-21-56	Christopher for Congress Comm, Nevada, Mo	500.00
9-21-56	E. E. Amour, St Alvans, Vt	500.00
9-21-56	McCarthy for Congress Comm St Paul, Minn	500.00
9-24-56	Weber County Dem Comm Ogden, Utah	500.00
9-25-56	Oregon Dem Cent Comm Portland, Ore	2,000.00
9-25-56	Morse Campaign, Portland, Ore	1,000.00
9-25-56	Wm E Doyle, Denver, Colo	1,000.00
9-25-56	Moss for Congress Comm Sacramento, Calif	500.00
9-25-56	Robert J. Harris, Cincinnati, Ohio	500.00
9-25-56	John A. Blatnik, Duluth, Minn	500.00
9-26-56	Citizens for Frank Church, Boise, Idaho	1,000.00
9-27-56	Ray W. Weir, Minneapolis, Minn	500.00
10- 3-56	Imle for Congress Comm Mt Vernon, Ill	500.00
10- 4-56	John B. Bennett, Ontonagon, Mich	500.00
10- 4-56	Martha Griffiths Campaign Comm. Detroit, Mich	500.00

10- 9-56	Spillers Camp Comm Wheeling, W Va	500.00
10- 9-56	Whitehead for Congress Comm Radford, Va	500.00
10- 9-56	LeRoy Anderson Camp Comm Shelby, Mont	500.00
10- 9-56	Union County Dem Comm N J	500.00
10- 9-56	Roger Fox, Ft Dodge, Iowa	500.00
10- 9-56	Moulder for Congress, Columbia, Mo	500.00
10- 9-56	Peter W. Rodino, Newark N J	500.00
10- 9-56	Burnside for Cong Comm Huntington, W Va	500.00
10- 9-56	Leonard D. Slutz Camp fund Cincinnati, Ohio	500.00
10- 9-56	James T. Devan Camp fund Cincinnati, Ohio	500.00
10- 9-56	Clyde E. Milligan, Kansas City, Kan	200.00
10- 9-56	Agnes Geelan, Enderlin, N D	500.00
10- 9-56	Calif Ry Labor Citizens League, Monterey Pk. Calif	500.00
10- 9-56	Harry Kampelman, Passaic NJ	500.00
10- 9-56	Harry Lerner, Newark NJ	500.00
10-10-56	Magnuson Campaign Comm Seattle	2,000.00
10-10-56	John A. Mapp, Bristol, Va	500.00
10-15-56	Stengel For Senator, Chicago, Ill	1,000.00
10-16-56	Betty Hill, Pittsburg Pa	500.00
10-17-56	Frank M. Karsten St Louis, Mo	500.00
10-17-56	Heyworth for Congress, Lansing, Mich	500.00
10-17-56	Fridel for Congress, Baltimore, Md	500.00
10-18-56	Stevenson-Kefauver Dinner Comm. Wash DC	9,000.00
10-18-56	Jackson J. Holtz, Cong Camp Comm, Boston, Mass	500.00

10-18-56	George McMahon, Roanoke, Va	187.37
10-23-56	Rhodes for Cong Comm Reading, Pa	500.00
10-29-56	Moreland Camp Comm Okla City, Okla	500.00
10-30-56	Geo. E. McMahon, Roanoke, Va	187.37
10-30-56	Mahoney Camp Comm Baltimore, Md	2,000.00
10-30-56	Dodd for Senator Comm W Hartford, Conn	2,000.00
10-30-56	Wm. E. Doyle, Denver, Colo	2,000.00
10-30-56	Evans Camp Comm. Arnolds Park, Iowa	1,000.00
10-31-56	RLPL Educational Fund—transfer of operating exp	3,628.12
11- 1-56	Wm Powers, Providence, R I	1,500.00
11- 1-56	Jackson Holtz, Cong Camp Comm Boston, Mass	500.00
11- 1-56	Citizens Comm for Peter F. Mack, Springfield, Ill	500.00
11- 1-56	Imle for Cong Comm Mt Vernon, Ill	250.00
11- 1-56	J. K. Dear, Dem Chrm 2nd Dist Kansas City, Mo	200.00
11- 2-56	Camp Comm for Robert Giano, New Haven, Conn	500.00
11- 2-56	Camp Comm for Harris B. McDowell, Middleton, Del	500.00
11- 2-56	Wm. F. Denman, Camp Comm Des Moines, Iowa	500.00
11- 2-56	Camp Comm for John W. King, Greencastle, Ind	500.00
11- 2-56	Camp Comm for Hamilton Fox, Salisbury, Md	500.00
11- 2-56	Camp Comm for Geo. G. Lindsay, Tremont, Pa	500.00
11- 2-56	Camp Comm for James G. Polk, Highland, O	500.00
11- 2-56	Camp Comm for Thomas L. Ashley, Waterville, O	500.00

11- 2-56	Camp. Comm. for Al Ullman, Baker, Ore	500.00
11- 2-56	Camp. Comm. for Wm. Mahoney, Phoenix, Ariz	500.00
11- 2-56	Camp. Comm. for Cecil R. King, Inglewood, Calif	500.00
11- 2-56	Camp. Comm. for Chet Hollifield, Montebello, Calif	500.00
11- 2-56	Camp. Comm. for Clyde Doyle, South Gate, Calif	500.00
11- 2-56	Camp. Comm. for James Roosevelt, Los Angeles Calif	500.00
11-14-56	George E. McMahon, Roanoke, Va.	359.30
11-21-56	Melvin E. Price, E St Louis, Ill	500.00
11-21-56	King County Cem Central Comm. Seattle, Wash	2,000.00

All contributions were made for purposes of general activity.

(5)	Expenditures not listed unded Paragraph (4)	$ 2,800.00
(6)	Total Expenditures made during 1956	$104,469.60

PLAINTIFFS' EXHIBIT NO. 14—Continued

Report of Railway Labor Political League to Secretary of U. S. House of Representatives, dated January 1, 1957 (Orig. Rec. 310-316):

Date	*Name of Payee*	*Purpose*	*Amount*
1-22-57	Morse Deficit Committee		$2 000
2-28-57	Robert Bryant	Contribution for general activity	2 000
3-18-57	Jack Beatty, Treasurer	Contribution for general activity	750
3-14-57	Robert Bryant	Contribution for general activity	2 000
8-20-57	Proxmire for U.S. Senate Committee	Contribution for general activity	1 000
10-29-56	Moreland Campaign Fund		500
10-30-56	George E. McMahon	Contribution for general expenses while campaigning in Virginia	187 37
10-30-56	Mahoney Campaign		2 000
10-30-56	Dodd for Senate Committee		2 000
10-30-56	Wm. E. Doyle	Contribution for general activity	2 000
10-30-56	Evans Campaign Committee		1 000
10-31-56	Transfer of Funds to Railway Labors' Political League Education Fund		3 628 12
1-31-56	Harley O. Staggers	Contribution for general activity	1 000

Date	*Name of Payee*	*Purpose*	*Amount*
3-17-56	Robert Michel	Contribution for general activity	300
3-27-56	Staggers for Congress Committee		1 000
4- 9-56	Magnuson Campaign Committee		$2 000 00
4-10-56	Smathers Campaign Committee		350 00
4-17-56	Democratic Nat'l. Committee		5 000 00
4-17-56	Woodrow Wilson Dinner Committee		2 000 00
4-25-56	James C. Murray Campaign Committee		500 00
4-25-56	Barratt O'Hara	Contribution for general activity	500 00
4-25-56	Citizens Committee for P. F. Mack		500 00
5-14-56	Kentucky Campaign K. Birkhead		1 000 00
5-25-56	COPE	Contribution for general activity	99 00
6-11-56	California Rwy. Labors Citizens League		500 00
6-12-56	W. J. Burton	Contribution for general activity	325 00
7- 2-56	Gene Wyatt	Contribution for general activity in 6th Cong. District	500 00
7- 2-56	Leonor Sullivan	Contribution for general activity	500 00
7- 2-56	E. L. Skipper	Expenses	83 45
7- 2-56	John B. Bennett	Contribution for general activity	500 00
7- 2-56	Hayworth Campaign for Congress		500 00

Date	*Name of Payee*	*Purpose*	*Amount*
7- 5-56	Charles Hurley	Contribution for general activity	1 000 00
7- 5-56	Joseph Craken	Contribution for general activity	500 00
7- 5-56	John W. Beemer	Contribution for general activity	500 00
7- 5-56	Frank M. Clark	Contribution for general activity	$ 500 00
7-10-56	Union County Democratic Committee		500 00
7-10-56	John B. Bennett	Contribution for general activity	500 00
7-10-56	Re-elect Senator Morse Committee		1 000 00
7-13-56	Leslie Biffle, Treas. Democratic Senatorial Campaign Committee		2 000 00
7-15-56	Democratic Senatorial Campaign Committee		2 000 00
7-24-56	9th Dist. Johnson for Congress Club		500 00
7-30-56	Gene Wyatt	Contribution for general activity	500 00
8-21-56	Don Magnuson Finance Committee		500 00
8-21-56	Burnside for Congress Committee		500 00
8-24-56	William Morse Campaign Committee		5 000 00
9- 5-56	Stengel for Senate Committee		5 000 00
9- 5-56	Foley for Congress Committee		500 00

Date	*Name of Payee*	*Purpose*	*Amount*
9-13-56	Alonzo Young for Maine Campaign		500 00
9-13-56	Joseph Craken—Macdonald for Congress Committee		500 00
9-13-56	Frank M. Karsten	Contribution for general activity	500 00
9-18-56	Cleveland M. Bailey	Contribution for general activity	500 00
9-21-56	Dodd for Senate Committee		2 000 00
9-21-56	Pfost Campaign Committee	Contribution for general activity	$ 500 00
9-21-56	H. S. Reuss		500 00
9-21-56	Hull for Congress Club		500 00
9-21-56	Winfield K. Kenton	Contribution for general activity	500 00
9-21-56	Christopher for Congress Club	Contribution for general activity	500 00
9-21-56	C. E. St. Amour		500 00
9-21-56	McCarthy for Congress Volunteer Committee		500 00
9-24-56	Weber County Democratic Central Committee		500 00
9-25-56	Oregon Democratic Central Committee		2 000 00
9-25-56	Morse Campaign Committee		1 000 00
9-25-56	William E. Doyle		1 000 00
9-25-56	Moss for Congress Campaign Committee		500 00
9-25-56	Robert J. Harris		500 00
9-25-56	John A. Blatuik		500 00

Date	*Name of Payee*	*Purpose*	*Amount*
9-26-56	Citizens for Frank Church		1 000 00
9-27-56	Roy W. Wier		500 00
10- 3-56	Imle for Congress Campaign Committee		500 00
10- 4-56	John B. Bennett	Contribution for general activity	500 00
10- 4-56	Martha Griffith's Campaign Committee		500 00
10- 9-56	Spillers Campaign Committee		500 00
10- 9-56	Whitehead for Congress Committee		500 00
10- 9-56	LeRoy Anderson for Congress Committee		500 00
10- 9-56	Union County Democratic Committee		500 00
10- 9-56	Roger Fox		$ 500 00
10- 9-56	Moulder for Congress Club		500 00
10- 9-56	Peter W. Rodino		500 00
10- 9-56	Burnside for Congress Committee		500 00
10- 9-56	L. D. Slutz Campaign Fund		500 00
10- 9-56	J. T. Dewan Campaign Fund		500 00
10- 9-56	Clyde E. Milligan, Treas., 2nd Cong. Dist of Kansas	Contribution for general activity	200 00
10- 9-56	Agnes Geelan	Contribution for general activity	500 00
10- 9-56	California Railway Labors Citizens' League		500 00

Date	*Name of Payee*	*Purpose*	*Amount*
10- 9-56	New Jersey State Democratic Committee		500 00
10- 9-56	Harry Lerner	Contribution for general activity	500 00
10-10-56	Magnuson Campaign Committee		2 000 00
10-10-56	Pat Jennings Campaign Committee		500 00
10-15-56	Stengel for Senate Committee		1 000 00
10-16-56	Betty Hill	Contribution for general activity 28 Dist.	500 00
10-17-56	Frank M. Karsten	Contribution for general activity	500 00
10-17-56	Hayworth Campaign for Congress		500 00
10-17-56	Friedel for Congress		500 00
10-18-56	Stevenson-Kefauver Dinner Committee		9 000 00
10-18-56	Jackson J. Holtz Congress Campaign Committee		500 00
10-18-56	George G. McMahon	Campaign expenses in Virginia	$ 187 36
10-23-56	Rhodes for Congress Committee		500 00
11- 1-56	William Powers		1 500 00
11- 1-56	Holz Congress Committee		500 00
11- 1-56	Citizens Committee for P. F. Mack		500 00
11- 1-56	Imle for Congress Committee		250 00
11- 1-56	J. K. Dear, Dem. Chmn., 2nd Dist.		200 00
11- 2-56	Campaign Committee for Robert Geasino		500 00

Date	*Name of Payee*	*Purpose*	*Amount*
11- 2-56	Campaign Committee for H. P. McDowell		500 00
11- 2-56	Campaign Committee for Wm. F. Denman		500 00
11- 2-56	Campaign Committee for John W. King		500 00
11- 2-56	Campaign Committee for Hamilton Fox		500 00
11- 2-56	Campaign Committee for George G. Lindsay		500 00
11- 2-56	Campaign Committee for James G. Polk		500 00
11- 2-56	Campaign Committee for Thomas L. Ashley		500 00
11- 2-56	Campaign Committee for Al Ullman		500 00
11- 2-56	Campaign Committee for Wm. P. Mahoney		500 00
11- 2-56	Campaign Committee for Cecil R. King		500 00
11- 2-56	Campaign Committee for Chet Halifield		500 00
11- 2-56	Campaign Committee for Clyde Doyle		500 00
11- 2-56	Campaign Committee for James Roosevelt		500 00
11-14-56	George E. McMahon		359 30
11-21-56	Melvin Price		500 00
11-21-56	King County Democratic Central Committee		$2 000 00

PLAINTIFFS' EXHIBIT NO. 15 — Excerpts from Report of Committee on Political Education to Clerk of U. S. House of Representatives (Orig. Rec. 316-332):

COMMITTEE ON POLITICAL EDUCATION

Date	*Name of Payee*	*Purpose*	*Amount*
3-14-56	Wilbur Nolen	Primary Campaign 2nd Congressional District	$ 500
4- 4-56	North Carolina Labor's League for Political Education	6th Cong. Dist Campaign for Ralph Scott	1 000
4- 4-56	North Carolina Labor's League for Political Education	Campaign of Hugh Wells, 11th Cong. Dist.	
4- 4-56	North Carolina Labor's League for Political Education	Campaign of Charles Deane, 8th Cong. Dist.	1 000
4- 4-56	Alabama Labor's League for Political Education	Campaign of James T. Hamrick, 1st. Cong. Dist.	500
4-11-56	Alabama Labor's League for Political Education	Campaign of Wilbur Nolen, 2nd Cong. Dist.	500
4-12-54	Dallas County Committee on Political Education	Campaign of Henry Wade, 5th Cong. Dist.	500
4-13-56	The Citizens Registration Committee	Promotion drives to register people for voting	1 600

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
4-26	Lankford for Congress Committee	Campaign	$ 500
5- 4	Staggers for Congress Committee	Campaign	500
5- 8	Allman for Congress Committee	Campaign	1 000
5-14	District of Columbia Committee for Representative Government	Contribution	4 500
5-14	North Carolina Labor's League for Political Education	Congressional Campaigns	2 500
5-14	North Carolina CIO Political Action Committee	Congressional Campaigns	2 500
5-19	Volunteer Committee for Perkins	Campaign	500
5-23	District of Columbia Committe for Representative Government	Contribution	500
5-24	Ralph Scott for Congress Committee	Campaign Contribution	1 000
6- 1	Citizens for Donoghue	Campaign Contribution	250
6-14	Re-elect Senator Wayne Morse Committee	Contribution	5 000
6-15	James V. Day	1st Cong. Dist Contribution	500
6-20	Illinois State CIO-PAC	Contribution Imle 23rd Cong. Dist.	1 000
6-29	Sabine Area Committee on Political Education	Contribution Brooks 2nd Cong. Dist.	450
7- 2	Texas AFL-CIO Joint Committee	Contribution Congressional Campaign	10 000

Date	Name of Payee	Purpose	Amount
1956			
7-10	Montana AFL-CIO and Committe on Political Education	Contribution Anderson 2nd Cong. Dist.	1 000
7-10	Rosen for Congress Club	Contribution 14th Cong. Dist.	500
7-17	Sabine Area Committee on Poiitical Education	Contribution Brooks 2nd Cong. Dist.	$ 300
7-17	Arkansas State Committee on Political Education	Contribution Jones 6th Cong. Dist.	500
7-17	Railway Labor's Political League	Contribution	2 000
7-20	Ross Bass Committee	Contribution 6th Cong. Dist.	1 000
8-3	Connecticut State PAC	Contribution Ward 1st Cong. Dist.	1 000
8-3	James Oliver Campaign Committee	Contribution 1st Cong. Dist.	1 000
8-3	Committee for F. Coffin for Cong.	Contributions 2nd Cong. Dist.	1 000
8-8	Textile Workers Union of American Political Education Fund	Contribution	2 000
8-10	Richards for Senate Committee	Contribution	5 000
8-10	Dodd for Senate Committee	Contribution	5 000
8-10	Stengel for Senate Committee	Contribution	5 000
8-10	Wickard for Senate Campaign Committee	Contribution	5 000
8-10	R. M. Evans for Senate Committee	Contribution	5 000
8-10	Clements Campaign Committee	Contribution	5 000

Date	Name of Payee	Purpose	Amount
1956			
8-10	Connecticut State PAC	Contribution Ward 1st Cong. Dist.	1 000
8-10	Magnuson Campaign Fund	Contribution	5 000
8-10	K. Holum for Senate Committee	Contribution	3 000
8-10	Clark for Senate Committee	Contribution	5 000
8-10	Q. Burdick Campaign Fund	Contribution	1 000
8-15	Central Maryland IUC-PAC	Contribution	$ 500
8-15	Maryland State IUC-PAC	Contribution	1 000
8-20	Staggers for Congress Committee	Contribution 2d Cong. Dist.	750
8-20	Burnside for Congress Committee	Contribution 4th Cong. Dist.	1 000
8-20	Reuss for Congress Committee	Contribution 5th Cong. Dist.	1 000
8-20	Johnson for Congress Club	Contribution 9th Cong. Dist.	1 000
8-27	G. Pfost Campaign Committee	Contribution 1st Cong. Dist.	1 000
8-27	J. C. Murray Campaign Account	Contribution 3rd Cong. Dist.	1 000
8-27	Hinko for Congress Committee	Contribution 4th Cong. Dist.	500
8-27	Pucinski for Congress Campaign	Contribution 11th Cong. Dist.	500
8-27	C. Boyle for Congress Committee	Contribution 12th Cong. Dist.	1 000
8-27	Citizens for Peter Mack, Jr.	Contribution 21st Cong. Dist.	1 000
8-27	K. Gray for Congress Committee	Contribution 25th Cong. Dist.	500

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
8-27	H. Fox Campaign Fund	Contribution 1st Cong. Dist.	500
8-27	Lankford for Congress Committee	Contribution 5th Cong. Dist.	750
8-27	Foley for Congress Committee	Contribution 6th Cong. Dist.	1 000
8-27	Brademas for Congress Committee	Contribution 3rd Cong. Dist.	1 000
8-27	Committee to Elect Whitehead	Contribution 5th Cong. Dist.	500
8-27	King for Congress Club	Contribution 6th Cong. Dist.	500
8-27	Hill Congressional Campaign Committee	Contribution 7th Cong. Dist.	500
8-27	W. K. Denton	Contribution 8th Cong. Dist.	500
8-27	Ulrich for Congress Committee	Contribution 9th Cong. Dist.	$ 500
8-27	Committee to Elect Carnony for Cong.	Contribution 10th Cong. Dist.	500
8-27	Caroey Congressional Campaign Fund	Contribution 11th Cong. District	500
8-27	L. Anderson Campaign Committee	Contribution 2nd Cong. Dist.	500
8-27	Committee to Reelect E. Green	Contribution 3rd Cong. Dist.	1 000
8-27	Lee Congressional Campaign Fund	Contribution 1st Cong. Dist.	500
8-27	Allman for Congress Committee	Contribution 2nd Cong. Dist.	500
8-27	Committee for Porter for Congress	Contribution 4th Cong. Dist.	500
8-27	Fogarty Congressional Committee	Contribution 2nd Cong. Dist.	500
8-27	G. McGovern for Congress	Contribution 1st Cong. Dist.	1 000

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
8-27	Whitehead for Congress	Contribution 6th Cong. Dist.	1 000
8-27	Jennings Congressional Campaign Fund	Contribution 9th Cong. District	1 000
8-27	Quenstedt Congressional Campaign Fund	Contribution 10th Cong. District	1 000
8-27	J. A. O'Callaghan	Contribution Cong. at large	1 000
8-27	Bennett 2nd Dist. Committee	Contribution 2nd Cong. Dist.	500
8-27	Martin for Congress Campaign Committee	Contribution 5th Cong. District	500
8-27	Kuta for Congress Campaign Fund	Contribution Cong. at large	1 000
8-27	Ward for Congress Campaign Committee	Contribution 1st Cong. Dist.	1 000
8-27	D. J. Flood Campaign Committee	Contribution 11th Cong. Dist.	1 000
8-27	Hon. J. M. Quigley	Contribution 19th Cong. Dist.	$1 000
8-27	Hon. F. M. Clark	Contribution 25th Cong. Dist.	1 000
8-27	Fullam Congressional Campaign Committee	Contribution 8th Cong. District	1 000
8-31	F. Church for Senate Committee	Contribution	5 000
8-31	W. Morse Political Committee	Contribution	2 000
8-31	Ardery for Cong. Campaign Committee	Contribution 3rd Cong. Dist.	1 000
9- 5	Moreland for Cong. Committee	Contribution 1st Cong. Dist.	1 000

Date	Name of Payee	Purpose	Amount
1956			
9- 5	Quinney for Cong. Committee	Contribution 6th Cong. Dist.	1 000
9- 5	Cross Campaign Committee	Contribution 7th Cong. Dist.	500
9- 5	McFall 11th Dist. Committee	Contribution 11th Cong. Dist.	1 000
9- 5	B. F. Sisk for Cong. Committee	Contribution 12th Cong. Dist.	500
9- 5	W. K. Stewart Campaign Committee	Contribution 13th Cong. Dist.	1 000
9- 5	McDowell for Cong. Committee	Contribution Cong. at large	1 000
9- 5	Giaimo for Cong. Campaign Committee	Contribution 3rd Cong. Dist.	1 000
9- 6	R. Weir Campaign Fund	Contribution 3rd Cong. Dist.	1 000
9- 6	Robbie for Cong. Committee	Contribution 5th Cong. Dist.	1 000
9- 6	Re-elect Coya to Cong. Committee	Contribution 9th Cong. Dist.	1 000
9- 6	Magnuson Campaign Fund	Contribution	1 000
9- 6	McCoy for Congress Committee	Contribution 3rd Cong. Dist.	1 000
9- 6	Aspinall for Cong. Committee	Contribution 4th Cong. Dist.	1 000
9- 6	Hon. B. O'Hara	Contribution 2nd Cong. Dist.	500
9-11	H. A. Williams Campaign Committee	Contribution	$1 000
9-19	Haroldson for Congress Committee	Contribution 7th Cong. Dist.	500
9-19	Mahoney for Congress Committee	Contribution 1st Cong. Dist.	1 000
9-19	Johnson for Congress Committee	Contribution 2nd Cong. Dist.	500

Date	Name of Payee	Purpose	Amount
1956			
9-19	W. K. Denton	Contribution 8th Cong. Dist.	1 000
9-19	Patterson for Congress Committee	Contribution 3rd Cong. Dist.	1 000
9-19	Polk Congressional Campaign Fund	Contribution 6th Cong. Dist.	1 000
9-19	Ashley Campaign Fund	Contribution 9th Cong. Dist.	1 000
9-19	Rosen for Congress Club	Contribution 14th Cong. Dist.	500
9-19	J. McSweeney for Congress Committee	Contribution 16th Cong. Dist.	500
9-19	Michigan PAC	Contribution Cong. at large	10 000
9-19	Mich. Labor's League for Political Education	Contribution Cong. at large	2 000
9-19	Fogarty Congressional Campaign Committee	Contribution 2nd Cong. Dist.	500
9-19	Miller for Congress Committee	Contribution 1st Cong. Dist.	500
9-19	W. Boring for Congress Committee	Contribution Cong. at large	500
9-19	Denman for Congress Committee	Contribution 5th Cong. Dist.	500
9-19	Coad Congressional Campaign Fund	Contribution 6th Cong. Dist.	500
9-19	Mahoney for Senate Campaign Committee	Senatorial Contribution	2 000
9-19	Friedel for Congress Committee	Contribution 7th Cong. Dist.	500
9-19	J. C. Carroll Senate Campaign Fund	Senatorial Contribution	5 000
9-20	C. M. Baley	Contribution 3rd Cong. Dist.	$1 000

Date	Name of Payee	Purpose	Amount
1956			
9-20	Textile Workers Union of America Political Education Fund	Contribution	5 000
9-21	Nat'l. Non-Partisan Issues Commission	Contribution	500
9-25	A. Chapin	Campaign Expenses	413
9-26	Doalan for Congress Committee	Contribution 14th Cong. Dist.	2 000
9-27	G. McGovern for Congress Committee	Contribution 1st Cong. Dist.	1 000
9-28	Arthur Chapin	Campaign Expenses	257 40
9-28	Maryland CIO-PAC	Contribution	1 600
10-2	Aspinall for Congress Committee	Contribution 4th Cong. Dist.	500
10-2	Cronning for Congress Committee	Contribution 1st Cong. Dist.	1 000
10-2	McConkie Campaign Committee	Contribution 3nd Cong. Dist.	1 000
10-2	K. Holum for Congress Committee	Contribution Cong. at large	2 000
10-2	Eastman Congressional Campaign Fund	Contribution 2nd Cong. District	500
10-2	Porter for Congress Committee	Contribution 4th Cong. Dist.	500
10-2	Moreland for Congress Committee	Contribution 1st Cong. Dist.	500
10-2	Q. Burdick Campaign Fund	Senatorial Contribution	1 500
10-2	Geelan for Congress Committee	Contribution Cong. at large	500
10-2	Hocking Cong. Campaign Fund	Contribution Cong. at large	500
10-2	W. Boring for Congress Committee	Contribution Cong. at large	1 500
10-2	J. Benesch for Congress Fund	Contribution 2nd Cong. Dist.	1 000

Date	Name of Payee	Purpose	Amount
1956			
10-2	L. Anderson Campaign Committee	Contribution 2nd Cong. Dist.	500
10-2	Robbie for Congress Committee	Contribution 5th Cong. Dist.	1 000
10- 2	Haroldson for Congress Committee	Contribution 7th Cong. Dist.	$1 000
10- 2	Re-elect Coya to Cong. Committee	Contribution 9th Cong. Dist.	500
10- 2	Macdonald for Congress Committee	Contribution 8th Cong. Dist.	500
10- 2	J. Holtz for Congress Committee	Contribution 10th Cong. Dist.	500
10- 2	Mahoney for Senate Campaign Committee	Contribution	3 000
10- 2	Montgomery Congressional Fund	Contribution 4th Cong. Dist.	500
10- 2	Breeding for Congress Committee	Contribution 5th Cong. Dist.	500
10- 2	Mahoney 6th District Fund	Contribution 6th Cong. Dist.	500
10- 2	Wickard for Senate Committee	Contribution	2 500
10- 2	Brademas for Congress Committee	Contribution 3rd Cong. Dist.	500
10- 2	Carney Cong. Campaign Fund	Contribution 11th Cong. Dist.	500
10- 2	Clark for Senate Fund	Contribution	5 000
10- 2	Fullam Cong. Campaign Fund	Contribution 8th Cong. Dist.	500
10- 2	D. J. Flood Campaign Committee	Contribution 11th Cong. Dist.	1 000
10- 2	Herschberger for Congress Committee	Contribution 18th Cong. Dist.	500
10- 2	Hon. J. M. Quigley	Contribution 19th Cong. Dist.	1 000

Date	Name of Payee	Purpose	Amount
1956			
10- 2	Thomas for Congress Committee	Contribution 24th Cong. Dist.	500
10- 2	Hon. F. M. Clark	Contribution 25th Cong. Dist.	1 000
10- 2	Holland for Congress Committee	Contribution 30th Cong. Dist.	500
10- 2	Campaign Fund of P. W. Rodino, Jr.	Contribution 10th Cong. Dist.	500
10- 2	F. Church for U. S. Senate	Contribution	1 000
10- 2	O'Callaghan for Congress Fund	Contribution Cong. at large	1 000
10- 2	Staggers for Congress Committee	Contribution 2nd Cong. Dist.	500
10- 2	Burnside for Congress Committee	Contribution 4th Cong. Dist.	1 000
10- 2	Magnuson Campaign Fund	Contribution	1 000
10- 2	McCoy for Congress Committee	Contribution 3rd Cong. Dist.	1 000
10- 2	Whitehead for Congress Committee	Contribution 6th Cong. Dist.	500
10- 2	Lankford for Congress Committee	Contribution 5th Cong. Dist.	500
10- 2	Foley for Congress Committee	Contribution 6th Cong. Dist.	500
10- 2	Wetherby for Senate Fund	Senate Contribution	5 000
10- 2	J. C. Murray Campaign Acco[illegible]	Contribution 3rd Cong. Dist.	500
10- 2	Hinko for C[illegible]ess Committee	Contribution 4th Cong. Dist.	500
10- 2	Yates Cong. Campaign Fund	Contribution 9th Cong. Dist.	500
10- 2	Pusinski for Cong. Campaign Fund	Contribution 11th Cong. Dist.	500

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
10- 2	C. Boyle for Congress Camp. Fund	Contribution 12th Cong. Dist.	500
10- 2	Allen for Cong. Committee	Contribution 18th Cong. Dist.	500
10- 2	Citizens Committee for P. Mack, Jr.	Contribution 21st Cong. Dist.	500
10- 2	K. Gray for Congress Committee	Contribution 25th Cong. Dist.	500
10- 2	G. Pfost Campaign Committee	Contribution 1st Cong. Dist.	1 000
10- 2	Reynolds Campaign Fund	Contribution 2nd Cong. Dist.	500
10- 2	Dodd for Senate Committee	Contribution	2 500
10- 2	Ward for Congress Committee	Contribution 1st Cong. Dist.	1 000
10-2	Bennett 2nd Dist. Committee	Contribution 2d Cong. Dist.	$1 000
10-2	Giaimo for Cong. Campaign Fund	Contribution 3d Cong. Dist.	500
10-2	Martin for Cong. Campaign Fund	Contribution 5th Cong. Dist.	1 000
10-2	Cross Campaign Committee	Contribution 7th Cong. Dist.	1 000
10-2	McFall 11th Dist. Committee	Contribution 11th Cong. Dist.	1 000
10-3	P. Weightman	Campaign Expenses	500
10-4	North Carolina State CIO-PAC	Contribution	1 500
10-5	Hayes Cong. Campaign Fund	Contribution 18th Cong. Dist.	500
10-5	Carter Cong. Campaign Committee	Contribution 4th Cong. Dist.	500
10-5	Mahoney for Cong. Committee	Contribution 1st Cong. Dist.	1 000
10-5	Reuss for Congress Committee	Contribution 5th Cong. Dist.	1 000

Date	Name of Payee	Purpose	Amount
1956			
10-5	Johnson for Cong. Club	Contribution 9th Cong. Dist.	1 000
10-5	Idaho Labor's League for Political Education	Contribution	2 500
10-5	Idaho PAC	Contribution	2 500
10-5	Macdonald for Congress	Contribution 8th Cong. Dist.	500
10-5	J. Holtz for Congress Committee	Contribution 10th Cong. Dist.	500
10-9	E. R. Williamson	Office Expense	67 06
10-10	Los Angeles Joint Board ACWA	Contribution	250
10-10	Maier for U. S. Senate	Contribution	2 500
10-10	Weatherby Senate Campaign Fund	Contribution	2 500
10-10	Clements for Senate Committee	Contribution	2 500
10-10	Richards for U. S. Senator Fund	Contribution	5 000
10-10	Flynn for Congress Committee	Contribution 1st Cong. Dist.	1 000
10-8	O'Hara for Cong. Campaign Fund	Contribution 2d Cong. Dist.	500
10-10	Kastenmeier Campaign Fund	Contribution 2d Cong. Dist.	1 000
10-10	Wilson for Congress Committee	Contribution 1st Cong. Dist.	1 000
10-10	Patterson Cong. Campaign	Contribution 2d Cong. Dist.	1 000
10-10	Christopher for Cong. Committee	Contribution 4th Cong. Dist.	1 000
10-10	Hull Cong. Campaign Fund	Contribution 6th Cong. Dist.	1 000
10-10	Moulder for Congress Club	Contribution 11th Cong. Dist.	1 000
10-10	Rogers for Cong. Fund	Contribution 1st Cong. Dist.	1 000

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
10-10	Utah State AFL-CIO COPE	Contribution	2 500
10-12	New Jersey State CIO-PAC	Contribution	500
10-12	Dallas AFL-CIO Council	Contribution	500
10-12	Mich. State PAC	Contribution	1 000
10-12	Wickard for Senate Committee	Contribution	2 500
10-12	Cincinnati Council PAC	Contribution	500
10-12	United Labor Committee for Williams	Contribution 6th Cong. Dist.	1 000
10-12	Thompson for Congress Committee	Contribution 4th Cong. Dist.	500
10-12	Carvey Cong. Campaign Fund	Contribution 11th Cong. Dist.	500
10-12	Illinois State CIO-PAC	Contribution	500
10-12	New York Laundry Workers Joint Board-ACWA	Contribution	1 000
10-12	Cleveland IUC	Contribution	1 000
10-12	Daniel Powell	Salary	173
10-12	Thomas A. Probey	Salary	79 15
10-12	Ernest R. Williamson	Salary	173
10-15	N. J. Labor's League for Political Education	Contribution	2 500
10-15	N. J. State PAC	Contribution	2 500
10-15	Textile Workers Union of America Political Education Fund	Contribution	$5 500
10-15	Textile Workers Union of America Political Education Fund	Contribution	500
10-15	Colo. State COPE	Contribution	100
10-17	Bible for Senate Campaign Fund	Contribution	500

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
10-19	Lowery for Congress Committee	Contribution 35th Cong. Dist.	250
10-19	Maryland-District of Columbia COPE	Contribution	2 000
10-19	Stevenson-Kefauver Campaign Dinner Committee	Contribution	1 000
10-19	Textile Workers Union of America Political Education Fund	Contribution	500
10-23	Rosen for Congress Club	Contribution 14th Cong. Dist.	500
10-23	Stengel for Senator Campaign Fund	Contribution	2 500
10-23	Forand for Congress Committee	Contribution 1st Cong. Dist.	500
10-23	Brock for Congress Committee	Contribution 3d Cong. Dist.	250
10-23	Hubert Smith for Congress Club	Contribution 15th Cong. Dist.	500
10-23	Campaign Committee for Donald L. O'Toole	Contribution 12th Cong. District	1 000
10-23	Lindsay for Congress Committee	Contribution 12th Cong. Dist.	500
10-23	Rhodes for Congress Committee	Contribution 14th Cong. Dist.	500
10-23	Mahoney for Senate Campaign Fund	Contribution	2 500
10-23	Nat'l. Non-Partisan Issues Committee	Contribution	1 500
10-23	King for Congress Club	Contribution 6th Cong. Dist.	500
10-23	John Carroll Senate Campaign Committee	Contribution	$2 500
10-23	Dodd for Senate Campaign Fund	Contribution	1 000

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
10-23	District of Columbia IUC	Contribution	500
10-23	Quenstedt Cong. Campaign Fund	Contribution 10th Cong. Dist.	500
10-23	Dodd for Senate Campaign Fund	Contribution	500
10-23	Wagner for Senate Campaign Fund	Contribution	5 000
10-23	Carvey Cong. Campaign Fund	Contribution 11th Cong. Dist.	500
10-23	Los Angeles Joint Board ACWA	Contribution	300
10-23	Cleveland Industrial Union Council	Contribution	1 000
10-23	Laundry Workers Joint Board—ACWA	Contribution	1 000
10-23	Ill. State PAC	Contribution	800
10-23	Dallas AFL-CIO Council	Contribution	500
10-23	N. J. State PAC	Contribution	500
10-24	Evans for Senate Campaign Fund	Contribution	2 500
10-26	Robbie for Congress Committee	Contribution 5th Cong. Dist.	500
10-26	Moreland for Congress Committee	Contribution 1st Cong. Dist.	500
10-26	Mahoney for Senate Campaign Fund	Contribution	2 500
10-26	Dodd for Senate Campaign Fund	Contribution	2 500
10-26	Stock for Congress Committee	Contribution 4th Cong. Dist.	1 000
10-26	Save our Resources Committee	Contribution	5 000
10-29	California Labor's League for Political Education	Contribution	2 500

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
10-29	Delaney for Congress Committee	Contribution 5th Cong. Dist.	500
10-29	McCutcheon Cong. Campaign Committee	Contribution 6th Cong. Dist.	$ 500
10-29	Garmatz for Cong. Headquarters	Contribution 3d Cong. Dist.	250
10-29	William Collins	Contribution Wagner Dinner Tickets	26
10-29	Stevenson-Kefauver Southern California Campaign Committee	Contribution	2 500
10-29	Johnson for Congress Fund	Contribution 2d Cong. Dist.	250
10-29	Quentin Burdick Campaign Fund	Contribution	375
10-29	John Carroll Senate Campaign Committee	Contribution	1 000
10-29	Re-elect Morse Committee	Contribution	2 000
10-29	Richards for Senate Campaign Fund	Contribution	1 000
10-30	Volunteers for Stevenson-Kefauver	Contribution	5 000
10-30	Stevenson-Kefauver Campaign Committee	Contribution	5 000
10-30	Stevenson-Kefauver Club	Contribution	5 000
10-30	Volunteers for Stevenson-Kefauver	Contribution	5 000
10-30	Volunteers for Stevenson-Kefauver	Contribution	3 000
10-30	Volunteers for Stevenson-Kefauver	Contribution	5 000
10-30	Volunteers for Stevenson-Kefauver	Contribution	5 000

Date	Name of Payee	Purpose	Amount
1956			
10-30	Volunteers for Stevenson-Kefauver	Contribution	5 000
10-30	N. J. State PAC	Contribution	500
10-30	Md.-D.C. Federation of Labor	Contribution	67 50
10-30	McDowell for Congress Committee	Contribution Cong. at large	750
10-30	Ullman for Congress Committee	Contribution 2d Cong. Dist.	500
10-30	LeRoy Anderson Campaign Committee	Contribution 2d Cong. Dist.	8 500
10-30	Los Angeles Joint Board ACWA	Contribution	300
10-31	Metropolitan Baltimore PAC	Contribution	500
10-31	Maryland IUC-PAC	Contribution	500
10-31	Okla. State Labor's League for Political Education	Contribution	2 000
10-31	AFL-CIO	Travel Expense	1 438 79
10-31	Johnson for Senate Committee	Senate Contribution	2 000
10-31	Weatherby Senate Campaign Fund	Senate Contribution	1 000
10-31	Calif. State PAC	Contribution	2 500
10-31	Calif. State Labor's League for Political Education	Contribution	2 500
11-2	Geo. Mahoney Campaign Committee	Contribution	2 500
11-2	Salem for Congress Committee	8th Cong. Dist. Iowa	200
11-2	Steel City Trade Union Council	Contribution	1 000
11-2	Weatherby Senate Campaign Fund	Contribution	1 000

Date	*Name of Payee*	*Purpose*	*Amount*
1956			
11-2	W. Va. Volunteers for Stevenson	Contribution	5 000
11-2	Tennessee Volunteers for Stevenson	Contribution	5 000
11-2	Virginia Volunteers for Stevenson	10th Cong. Dist.	5 000
11-2	Ind. State IUC	Contribution	200
11-2	Geo. Mahoney Campaign Committee	Contribution	2 500
11-2	Wickard Senate Campaign Fund	Contribution	3 000
12-5	William F. Schnitzler	Reimbursement for air travel — Andrew Biemiller	190 74
12-10	Nat'l. Non-Partisan Issues Committee	Contribution	2 000
1- 6	Allegheny County Democratic Committee c/o Elmer Holland, 1301 Commonwealth Bldg. Pittsburgh 22, Pa.	Campaign For Elmer Holland	$ 500 00
1957			
3-21	Texas State Industrial Council	Contribution— Yarborough	663 00
3-22	Joe M. Montoya	Contribution	500 00
3-22	New Mexico State AFL-CIO	Contribution— J. M. Montoya	500 00
4- 8	Independent Committee for Morse	Contribution	3 000 00
8- 1	AFL-CIO	Reimbursement of salaries and pension	6 069 59
8-21	Proxmire for Senate Committee	Contribution	4 000 00